

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

VIMALA, LLC dba ALECIA; et al.,

Plaintiff,

vs.

Case No. 3:19-CV-00513

WELLS FARGO BANK, N.A.; et al.,

Defendants.

REMOTE DEPOSITION OF
EFRAT KASZNIK

June 7, 2021

8:01 a.m.

732 San Rafael Place
Stanford, California

Rebecca Delgadillo, CSR No. 7021



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1 the input or information that went into your
2 projections?

3 A. I did.

4 Q. Okay. If this E-mail is -- assume for me that
5 this E-mail is fake and it was never sent from Wells
6 Fargo, would that change the opinions offered in your
7 expert report?

8 A. So the way this E-mail factors into my
9 analysis is that it is a payment schedule that was
10 relied upon. Even if this E-mail did not exist, there
11 was a reliance and there was an understanding that money
12 was going to be released from Wells Fargo.

13 So having this E-mail or not is not going to
14 change the fact that funds were withheld for a very long
15 period of time, and that Alecia was waiting for these
16 funds and refinancing her company in the meantime to
17 create some breach financing until these funds were
18 released. So it would not necessarily change my opinion
19 significantly.

20 Q. Okay. Would it change your opinions if there
21 were never funds held at Wells Fargo?

22 A. Then we wouldn't have a case, would we?
23 That's the case where we are here to talk about today.
24 If there were no funds, then we can all go home, right.

25 Q. Okay. Good. Do you know if in Ms.

REPORTER'S CERTIFICATION

I, Rebecca Delgadillo, Certified Shorthand Reporter,
in and for the State of California, do hereby certify:

That the foregoing witness was by me duly sworn;
that the deposition was then taken before me at the time
and place herein set forth; that the testimony and
proceedings were reported stenographically by me and
later transcribed into typewriting under my direction;
That the foregoing is a true record of the testimony and
proceedings taken at that time.

IN WITNESS WHEREOF, I have subscribed my name this
10th day of June, 2021.



Rebecca Delgadillo, CSR No. 7021